UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF THE
REGIONAL ADMINISTRATOR

January 9, 2020

Alex Strysky
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Richard Doucette
Federal Aviation Administration
1200 District Avenue
Burlington MA 01803

RE: Nantucket Memorial Airport Capital Improvement Plan Projects Expanded Environmental Notification Form EEA #16128

Dear Mr. Strysky and Mr. Doucette:

This letter is provided to help the Federal Aviation Administration and the Massachusetts Office of Energy and Environmental Affairs determine an appropriate scope of analysis for the upcoming Environmental Assessment/Environmental Impact Report (EA/EIR) for the Nantucket Memorial Airport Capital Improvement Plan.

The Expanded Environmental Notification Form for the project describes several airport capital improvements proposed over the next five years. The work generally includes taxiway improvements, work on the perimeter road and fencing, crew quarters and apron expansion work. While we have no specific objections to the proposed capital improvements, we recommend that the scope of the EA/EIR specifically address our comments below related to water quality, Sole Source Aquifers, surface and groundwater discharges, and monitoring.

- The Nantucket Airport overlies a Sole Source Aquifer and the proposed improvements will be funded in part by the FAA. Therefore, the proposed improvements will be subject to review under EPA's Sole Source Aquifer Protection Program. The Safe Drinking Water Act (Section 1424(e)) requires review of any federally-funded project within areas classified as "Sole Source Aquifers." A Sole Source Aquifer is defined as an aquifer which supplies at least 50% of the drinking water consumed in the area overlying the aquifer. An aquifer is defined as an underground layer of water-bearing permeable rock, rock fractures or unconsolidated materials (gravel, sand, or silt) from which groundwater can be extracted using a water well. To fit this definition, no alternative drinking water sources(s) are available that could physically, legally, and economically supply water to all who depend on the aquifer for drinking water. EPA requests that the EA/EIR provide

information responsive to the attached *EPA Region 1 Sole Source Aquifer Project Review Information* document to support our work to determine whether project construction and operation has the potential to contaminate the underlying aquifer.

- We recommend that the EA/EIR fully explain whether the proposed project (in whole or part) will result in construction or operation period surface water discharges that will trigger state or federal authorizations (such as for NPDES permits). The discussion should also explain these authorizations and how the work will be designed to be consistent with regulatory requirements. The discussion should also explain whether groundwater discharges are proposed that will require state or federal authorization and how those discharges will be designed to be consistent with regulatory requirements. Any subsurface stormwater infiltration structures will require the submittal of an underground injection control (UIC) registration application to MassDEP. Other subsurface discharges might require permitting or notification to MassDEP.

- It appears that numerous public and private wells are located downgradient of the airport. Therefore, we recommend that the description of existing conditions include a groundwater flow map for the airport property/project area.

- We recommend that the EA/EIR summarize the result of past (and current) groundwater monitoring conducted at or near the Nantucket Airport. The EA/EIR should explain whether the monitoring shows any adverse impacts to public water supplies and private wells associated with airport activities.

- We recommend that the EA/EIR describe how construction and operation of the proposed airport improvements are designed to minimize water quality impacts. The discussion should include a list of chemicals and de-icing products used and a description of how they will be stored and managed on the airport property. In addition, vehicle maintenance practices and other activities that potentially create runoff exposed to pollutants should be described. Lastly, the EA/EIR should include a list of past and current firefighting foam products (which might contain PFOA/PFAS/PFOS chemicals) used at the airport.

- Two water databases (National Hydrography Dataset and MassGIS/OLIVER) show the existence of a named stream (Nobadeer Valley) on airport property. The EA/EIR should document whether this watercourse exists and whether the project will result in any potential discharges to this feature.

- We recommend coordination with the local water department (Wannacomet Water Company) regarding the proposed capital improvements and that the results of this coordination be described in the EA/EIR. In addition, given the proximity of the airport to private wells, coordination with the Nantucket Board of Health is also recommended.

EPA is willing to provide technical assistance on the issues identified in this letter and to review administrative drafts of the EA/EIR as appropriate prior to publication. Please contact me at 617-918-1025 if you have any questions regarding our comments.

Sincerely,

Timothy L. Timmermann
Director, Office of Environmental Review

Enclosure

EPA Region 1 Sole Source Aquifer Project Review Information

Responses to 1-14 below will assist the EPA Sole Source Aquifer (SSA) Program in evaluating whether proposed projects have the potential to contaminate a sole source aquifer. EPA may request additional information as necessary.

1. Provide: location of project, map, and name of sole source aquifer.

2. Provide: project description and federal funding source (e.g., Federal Highway Administration, Housing and Urban Development etc.)

3. Will the project result in any increase of impervious surface? If so, what is the area?

4. Provide: description of how storm water is currently treated on the project site.

5. How will storm water be treated on this site during construction and after the project is complete?

6. Are there any underground storage tanks present or to be installed? Include details of such tanks.

7. Will any liquid or solid waste be generated? If so, how will it be disposed?

8. What is the depth of excavation?

9. Are there any wells in the area that may provide direct routes for contaminates to access the aquifer and how close are they to the project?

10. Are there any hazardous waste sites in the project area? Do any such waste sites have underground plumes with monitoring wells that may be disturbed? Include details.

11. Are there any deep pilings that may provide access to the aquifer?

12. Are Best Management Practices (BMPs) planned to address any possible risks or concerns?

13. Does the project include any improvements that may be beneficial to the aquifer, such as improvements to the wastewater treatment plan?

14. Is there any other information that could be helpful in determining if this project may affect the aquifer?

To initiate an EPA SSA Review, please contact:

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